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From: Arthur Gruber, CLU [<mailto:arthurgruber@netzero.net>]

Sent: Thursday, July 16, 2015 2:02 PM

To: EBSA, E-ORI - EBSA

Subject: RIN1210-AB32

I wish to comment on the above-Prohibited Transaction Exemption (PTE 84-24). I have been an insurance broker for 50 years and have used Annuities along with Mutual Funds and Life Insurance to help individuals and Companies plan for their future and fund their financial obligations. I have been subject to the Department of Financial Services (formerly State Insurance Dept) for all those years. I have endured the burden of compliance and realized that it was meant as a protection for consumers. Each state operates differently and within the province of their State Insurance Department. The business model of Insurance Companies compensating the broker for selling a financial product (annuities) has worked extremely well and has served a public service to the extent that consumers are not reluctant to consider a product in which there are no fees attached to it. Conversely, consumers will believe have hesitancy in paying a fee to a financial advisor to purchase a product such as a fixed annuity. This will substantially diminish the middle class market for savings using this product as there is little or no experience for paying a "fee" to purchase a product that was formerly "free".

There is no logical reason to extend DOL's reach to the fixed annuity market. It is not a security! That is evident. This seems to be simply overreach by the Federal Government to control ALL financial transactions. The Federal Government has a spotty record of oversight: IRS, Veterans Administration. Why do you believe that extending the bureaucracy further, will result in better oversight and more efficiency.

I doubt that it will...I believe the motivation is simply to usurp those powers left to the states and to make the Federal Government omnipotent in all financial matters. Did not our Constitution give powers to the states that are NOT EXPRESSLY GIVEN TO THE FEDERAL GOVERNMENT. This is clearly a power that should not now be moved to the Federal Government!

Sincerely,

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